

Project Summary

I. INTRODUCTION

This source has applied for a renewal of its Clean Air Act Permit Program (CAAPP) operating permit. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. Unlike this source's current state operating permit(s), the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Printpack is located at 1400 Abbott Drive in Elgin. The source performs printing on flexible packaging materials primarily on rotogravure presses. There are two emission control systems: a catalytic afterburner and one regenerative thermal oxidizer. Preparation of the final product may also involve extrusion and lamination. The lamination (joining together of two materials) process may involve a hot melt thermoplastic or an adhesive.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
L31	Mecca Adhesive Laminator	Pre-1972	Catalytic Afterburner (102)
L32	Black-Clawson Extrusion Laminator	1965	None
L37	Black-Clawson Solvent Laminator (Same Unit as L32 Using Solvent-Based Adhesive)	1965	Total Enclosure Vented to Regenerative Thermal Oxidizer (103)
L33/34	Egan Tandem Extrusion Laminator	1987	None
L35/36	Solvent Adhesive Laminator	2004	Total Enclosure Vented To

Emission Unit	Description	Date Constructed	Emission Control Equipment
			Regenerative Thermal Oxidizer (IO3)
PW01	Manual Parts Washer	Prior to 1977	Total Enclosure Vented to Regenerative Thermal Oxidizer (IO3)
P02	Cerutti Rotogravure Printing Press	1990	Total Enclosure Vented to Regenerative Thermal Oxidizer (IO3)
P06	Schiavi Rotogravure Printing Press	1994	Total Enclosure Vented to Catalytic Afterburner (IO2) or Regenerative Thermal Oxidizer (IO3)
PW02	Automatic Parts Washer	1990	Total Enclosure Vented to Catalytic Afterburner (IO2) or Regenerative Thermal Oxidizer (IO3)
P07	Cerutti Rotogravure Printing Press	1997	Total Enclosure Vented to Regenerative Thermal Oxidizer (IO3)

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Emission Unit	Description	Date Constructed	Emission Control Equipment
P08	Schiavi Rotogravure Printing Press	1997	Total Enclosure Vented to Regenerative Thermal Oxidizer (IO3)
PW03	Parts Washer	1997	Total Enclosure Vented to Regenerative Thermal Oxidizer (IO3)
TR1-4	Corona Film Treaters	1997	Ozone Destruction System on Individual Units

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. The proposed permit limits the maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source limit.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	435.36
Sulfur Dioxide (SO ₂)	0.80
Particulate Matter (PM)	2.27
Nitrogen Oxides (NO _x)	44.41
HAP, not included in VOM or PM	----
Other (O ₃)	----
Total	482.84

This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Construction and Modification. Any such terms and conditions are identified within the permit. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

Because this source is located in the Chicago ozone nonattainment area and emits volatile organic material, the permit includes conditions to implement the Emission Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce emissions from stationary sources to contribute to further reasonable progress toward attainment, as further described in section 6 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning

in 1998, which will document emission reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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